

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) LASHETICA MCQUIETOR,)	
)	
Plaintiff,)	
)	
v.)	CASE NO.
)	
(1) CHAMPION NATIONAL SECURITY,)	
INC., a Foreign Corporation;)	
and)	
(2) WAL-MART STORES EAST, L.P., a)	
Foreign Limited Partnership)	
)	
Defendants.)	

DEFENDANT CHAMPION NATIONAL SECURITY, INC.'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant Champion National Security, Inc., (“Champion”) hereby files this Notice of Removal of this case from the District Court of Tulsa County, State of Oklahoma to this Court. In support of removal, Northland states the following:

1. On April 21, 2021, Plaintiff Lashetica McQuietor, individually, filed a Petition in the District Court of Tulsa County, State of Oklahoma, captioned: Lashetica McQuietor, individually, Plaintiff, v. Champion National Security, Inc., a Foreign Corporation, and Wal-Mart Stores East, L.P., a Foreign Limited Partnership, Defendants, Case No. CJ-2021-01141. (*See* Petition, Ex. 1).

2. Defendant Champion National Security, Inc., a Foreign Corporation was served with process of Plaintiff’s Petition in the State Court Action on April 26, 2021. (*See* Champion Summons, Ex. 2).

3. Defendant Wal-Mart Stores East, L.P., a Foreign Limited Partnership was served with process of Plaintiff's Petition in the State Court Action on April 26, 2021. (*See* Wal-Mart Summons, Ex. 3).

4. Plaintiff's Petition seeks judgment against Defendants in an amount in excess of the amount required for diversity jurisdiction pursuant to 28 U.S.C. § 1332. (*See* Petition, Ex. 1, p. 3).

5. Plaintiff is a citizen of the state of Oklahoma. (*See* Petition, Ex. 1, ¶ 1).

6. Defendant Champion National Security, Inc., is a foreign corporation with its principal place of business in Texas.

7. Defendant Wal-Mart Stores East, L.P., is a foreign limited partnership with its principal place of business in Arkansas.

8. Because the amount in controversy exceeds \$75,000.00 and diversity exists between the parties, this case is properly removed within the applicable time constraints pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

9. The United States District Court for the Northern District of Oklahoma is the appropriate court for filing the instant Notice of Removal, as it embraces the District Court of Tulsa County, State of Oklahoma, where the State Court Action is currently pending.

10. Upon receiving the federally-filed Notice of Removal, Champion will file a copy of the Notice of Removal with the District Court of Tulsa County, State of Oklahoma, under the Case No. CJ-2021-01141, as well as provide written notice to Plaintiff's Counsel, in accordance with 28 U.S.C. § 1446(d).

11. Pursuant to 28 U.S.C. § 1446 and LCvR 81.2(a), a copy of the docket sheet and a copy of the documents filed and/or served in the State Court Action are attached hereto. (*See*, State

Court Petition, Ex. 1; State Court Summons served upon Champion National Security, Inc., Ex. 2; State Court Summons served upon Wal-Mart Stores East, L.P., Ex. 3; State Court docket sheet, Ex. 4).

12. Under the provisions of 28 U.S.C. § 1332, 1441, and 1446 and all other applicable statutes with which Defendants herein have fully complied, this cause of action is removable to the United States District Court for the Northern District of Oklahoma.

Respectfully submitted,

/s/ Kyle R. Prince

Derrick T. DeWitt, OBA #18044

Kyle R. Prince, OBA # 33040

DEWITT PARUOLO & MEEK

P.O. Box 138800

Oklahoma City, OK 73113

(405) 705-3600 (PH)

(405) 705-2573 (F)

dewitt@46legal.com

kprince@46legal.com

ATTORNEYS FOR DEFENDANT

CHAMPION NATIONAL SECURITY, INC.

CERTIFICATE OF SERVICE

This is to certify that on the 17th day of May, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Donald E. Smolen, Sr., OBA #8431
616 S. Main Street, Suite 301
Tulsa, OK 74119-1261
dsmolensr@gmail.com
T: (918) 583-7800
F: (918) 583-7838
Attorney for Plaintiff

/s/ Kyle R. Prince